

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
WINSTON FARRELL,

07-cv-4052 (LAK)

Plaintiff,

-against-

THE CITY OF NEW YORK, and Police Officer
SCHNIDER of the Midtown South Precinct,

**DEMAND FOR THE
PRODUCTION OF
DOCUMENTS PURSUANT
TO FEDERAL RULE OF
CIVIL PROCEDURE 34**

Defendants.

----- X
Plaintiff WINSTON FARRELL requests the defendants to respond to the following requests in that:

1. Defendants produce and permit plaintiff to inspect and to copy each of the following documents:
 - a. Copies of all Police and/or incident reports and/or other memoranda in defendant's possession concerning the incident alleged in the complaint, including but not limited to
 - i. Omniform Arrest Report.
 - ii. Omniform Compliant Report.
 - iii. Online Booking System Arrest Worksheet.
 - iv. Property Clerk Invoices.
 - v. Prisoner Pedigree Card.
 - vi. Complaint Report Worksheet.
 - vii. Activity Log entries.

- viii. Supporting Depositions.
 - ix. Sprint Report.
 - x. Medical Treatment of Prisoner Form.
 - xi. Aided Report Worksheet (PD304-152b).
 - xii. Non-lethal restraining device/rescue equipment report (PD320-150).
 - xiii. Taser/Stun device report (PD304-150).
 - xiv. Unusual occurrence report (PD-370-152).
 - xv. Pre-Arrest Notification Form.
 - xvi. Overtime Reports (PD138-064).
 - xvii. Declined Prosecution Arrest Case Report (PD244-1515).
 - xviii. District Attorney's Declined Prosecution Form Letter.
 - xix. Prisoner Transport Dispatch (PD171-132).
 - xx. Memo Book entries.
- b. Copies of the employment and/or disciplinary records in the possession of defendant City of New York relating to the employees, Police Office SCHNIDER.

Plaintiff request that the defendants make these documents available to plaintiff's attorney, Michael Fineman, Esq., at a time and place mutually convenient to the parties, but in any event, prior to the taking of depositions.

Dated: New York, New York
July 10, 2007

Very truly yours,

THE LAW OFFICE OF MICHAEL FINEMAN, ESQ.

By: _____ /s/
Michael Fineman, Esq. (MF0282)
Attorney for Plaintiff,
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File No. 609/2006

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